

**TECHNICAL REVIEW DOCUMENT
For
RENEWAL OF
OPERATING PERMIT 01OPBA232
to be issued to:**

Springfield Municipal Power Plant
Baca County
Source ID 0090002

Prepared by Cathy Rhodes
March 2006

I. PURPOSE:

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued February 1, 2002 and expires on February 1, 2007. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted on January 30, 2006. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description:

This source is classified as an electric services facility under Standard Industrial Classification 4911. The Springfield Municipal Power Plant consists of four (4) operable internal combustion engine – electrical generating sets, used primarily for standby/emergency electrical generation. All units are dual fuel fired, either diesel fuel alone or a combination of diesel and natural gas. The generator sets are rated as follows: Unit 1 1250 kw, Unit 2 200 kw, Unit 4 592 kw and Unit 5 800 kw.

This facility is located in Springfield at 1241 Tipton in Baca County. This facility is located in an area that has been designated as attainment for all criteria pollutants.

Kansas, Oklahoma and New Mexico are affected states located within 50 miles of the facility. There are no federal class I designated areas within 100 km of this facility.

Facility wide emissions are as follows (tons/year):

<u>Pollutant</u>	<u>Actual</u>	<u>Potential</u>
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Particulate Matter	<1	37
PM ₁₀	<1	36
Nitrogen Oxides (NO _x)	<1	528
Sulfur Dioxide (SO ₂)	<1	35
Volatile Organic Compounds (VOC)	<1	36
Carbon Monoxide	<1	114

Actual emissions are based on the most recent submitted APENs. Potential emissions are based on maximum operating rates.

This facility does not emit significant amounts of Hazardous Air Pollutants (HAPs), according to the permit application. The facility is not subject to the Accidental Release Plan provisions of 112(r)(7) of the Clean Air Act.

Prevention of Significant Deterioration (PSD)

This plant is located in an area designated as attainment for all pollutants. The facility is an existing major source for purposes of PSD.

Compliance Assurance Monitoring (CAM)

This facility does not employ control equipment, and is not subject to the CAM provisions.

Title IV Acid Rain

This facility is not subject to the Acid Rain provisions. The units were constructed before the applicability date, and design rates are below applicable size requirements.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

Information Page

Responsible official and permit contact information is revised per request clarified on February 27, 2007.

Section I

Condition 1.3.2 – The permittee requested the opacity monitoring frequency to be changed from quarterly to annually. The condition is revised to reflect current Division monitoring requirements for emergency backup engines. These engines operate infrequently, therefore the Division has determined that an annual opacity reading is sufficient. In addition, the language regarding “nonroutine visible emissions” is deleted.

Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Springfield Municipal Operating Permit:

Information Page

Add language indicating when annual and semiannual reports must be received by the Division.

Section I

Condition 1.5 – Revised to change Condition 21 to 22 to reflect revisions to Section IV.

Condition 3.1 – Revised to reflect current Division permit language.

Condition 4.1 - Revised to reflect current Division permit language.

Condition 6 – Added for Compliance Assurance Monitoring (CAM) requirements. No add on control devices are used at this facility, therefore the CAM provisions do not apply to any units.

Section II

Condition 1.3 – Revised to update opacity language to current Regulation No. 1 language.

Section III

Update Permit Shield regulatory cite.

Condition 1 – Revised to reflect current Division permit language.

Section IV

Update to reflect revisions made to Regulation cites.

Appendices B and C

Incorporate Division's latest versions.

Appendix D

EPA addresses are updated.